

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

v.

DOES 1-5, individually and together
d/b/a Easybox IPTV,

Defendants.

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Civil Action No. 4:19-cv-2994

DECLARATION OF STEPHEN FERGUSON

I, Stephen Ferguson, of Houston, Texas, declare as follows:

1. I am admitted to practice in Texas, and an attorney with the firm of Hagan Noll & Boyle LLC (“HNB”), counsel for Plaintiff DISH Network L.L.C. (“DISH”). I make this declaration based on personal knowledge and, if called on to testify, would testify competently as stated herein. This declaration is made in support of DISH’s motion for leave to conduct expedited discovery and issuance of letters of request.

2. Attached as **Exhibit 1** is a true and correct copy of infringement reports that I sent to PayPal, Inc. from July 19, 2016 through September 12, 2016, concerning the following email addresses that were being used on *www.easybox.tv* to accept payments for Easybox set-top boxes and services:

- a. payments2929@gmail.com;
- b. brucexie977@gmail.com;
- c. kamcheung857@gmail.com;
- d. rminnott33@gmail.com; and
- e. xiaohu3777@gmail.com.

3. Attached as **Exhibit 2** is a true and correct copy of a motion for the issuance of letters rogatory and court order granting same on October 28, 2015 in *Republic of Kazakhstan v. Does 1-100*, No. 1:15-cv-01900-ER-HBP, Dkts. 21, 60 (S.D.N.Y.).

4. Attached as **Exhibits 3 – 12** are true and correct copies of the subpoenas that DISH seeks to serve.

5. Attached as **Exhibits 13 – 15** are true and correct copies of the letters of request that DISH moves the Court to issue.

6. Through the subpoenas and letters of request, DISH is requesting information from the third parties that will identify the name and contact information for the persons or entities responsible for the IPs or accounts, products and services used, servers used, documents submitted to create or change each account, account statements, payment records, and communications. Using the subpoena attached at Exhibit 12 as an example, this information is called for in Request Nos. 1-7.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2019.

/s/ Stephen Ferguson

Stephen Ferguson